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7 *Attorneys for Defendant*
8 **NETFLIX, INC.**

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 LAURI VALJAKKA,

12 *Plaintiff,*

13 v.

14 NETFLIX, INC.,

15 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF ELISE EDLIN IN
SUPPORT OF DEFENDANT NETFLIX,
INC.'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED [LAMKIN DECLARATION ISO
UNOPPOSED MOTION TO MODIFY
THE SCHEDULING ORDER]**

Judge: Hon. Jon S. Tigar

1 I, Elise Edlin, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in Walnut Creek,
3 California, and counsel representing Defendant Netflix, Inc. I have personal knowledge of the
4 facts set forth in this declaration and am competent to testify.

5 2. Pursuant to Civil L.R. 79-5, I make this declaration in support of Netflix's
6 Administrative Motion to Consider Whether Another Party's Material Should Be Sealed
7 ("Motion"). Non-party AiPi, LLC ("AiPi") has designated exhibits and material discussed in the
8 Declaration of Rachael Lamkin in Support of Netflix's Unopposed Motion to Modify the
9 Scheduling Order ("Lamkin Declaration") as Protected Material as defined by § 2(f) of the
10 Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential
11 Information and/or Trade Secrets (Dkt. No. 56) ("Protective Order").

12 3. The Lamkin Declaration contains discussion of documents produced by AiPi that it
13 designated as CONFIDENTIAL under the Protective Order.

14 4. Exhibits G through J to the Lamkin Declaration are documents produced by AiPi
15 that it designated as CONFIDENTIAL under the Protective Order.

16 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
17 and correct to the best of my knowledge.

18 Executed on March 14, 2025 in Walnut Creek, California.

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20 /s/ Elise Edlin

21 Elise Edlin
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